

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

DAVIS INTERNATIONAL, LLC, HOLDEX, LLC,;  
FOSTON MANAGEMENT, LTD, and :  
OMNI TRUSTHOUSE, LTD, :

Plaintiffs, :

v. :

No. 04-1482-GMS

NEW START GROUP CORP., VENITOM CORP., :  
PAN-AMERICAN CORP., MDM BANK, :  
URAL-GORNO METALURAGICAL COMPANY, :  
EVRAZ HOLDING, MIKHAIL CHERNOI, :  
OLEG DERIPASKA, ARNOLD KISLIN, :  
MIKHAIL NEKRICH, and ISKANDER :  
MAKMUDOV, :

Defendants. :

**EXHIBITS TO PLAINTIFFS' PLAINTIFFS' BRIEF IN OPPOSITION  
TO DEFENDANTS' MOTION TO DISMISS THE COMPLAINT  
PURSUANT TO THE DOCTRINE OF DIRECT ESTOPPEL AND TO  
ENJOIN PLAINTIFFS FROM RE-FILING THIS ACTION**

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